

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,
Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

DECLARATION OF PATRICK T. EGAN

Patrick T. Egan declares that:

1. I am a partner at Berman DeValerio Pease Tabacco Burt & Pucillo, co-lead counsel for Class Plaintiffs in *Quaak v. Dexia*, 03-11566, listed above.
2. I submit this declaration on behalf of Plaintiffs in each of the above-captioned actions in connection with Plaintiffs' Response To (1) The Court's November 29, 2006 Request, And (2) Dexia's Objection To Magistrate Judge's November 6, 2006 Order On Plaintiffs' Counsel's Motion For Protective Order.
3. Annexed hereto as **Exhibit A** is a true and correct copy of Plaintiffs' Amended Notice of Rule 30(b)(6) Deposition of Defendant Dexia Bank Belgium dated May 10, 2006.
4. Annexed hereto as **Exhibit B** is a true and correct copy of Dexia Bank Belgium's Response To Plaintiffs' Statement Concerning Proposed Rule 30(b)(6) Depositions, dated November 20, 2006.
5. Annexed hereto as **Exhibit C** is a true and correct copy of Dexia Bank Belgium's Responses and Objections To Lead Plaintiffs' Second Set Of Interrogatories, dated October 31, 2005.
6. Annexed hereto as **Exhibit D** is a true and correct copy of Dexia Bank Belgium's Responses and Objections To Lead Plaintiffs' Third Set Of Interrogatories, dated January 18, 2006.
7. Annexed hereto as **Exhibit E** is a true and correct copy of Dexia Bank Belgium's Amended Responses and Objections to Plaintiffs' First Request For Admissions and Supplemental Interrogatories, dated July 17, 2006.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Boston, Massachusetts this 5th day of December, 2006.

/s/ Patrick T. Egan

Patrick T. Egan